



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

April 19, 2011

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

VIA E-MAIL AND FEDERAL EXPRESS

Mr. Allen Wood  
American Electric Power  
1 Riverside Plaza,  
Columbus, Ohio 43215-2373

Dear Mr. Wood:

On June 30, 2010 the United States Environmental Protection Agency ("EPA") and its engineering contractors conducted a coal combustion residual (CCR) site assessment at the SW Welsh facility. The purpose of this visit was to assess the structural stability of the impoundments or other similar management units that contain "wet" handled CCRs. We thank you and your staff for your cooperation during the site visit. Subsequent to the site visit, EPA sent you a copy of the draft report evaluating the structural stability of the units at the SW Welsh facility and requested that you submit comments on the factual accuracy of the draft report to EPA. Your comments were considered in the preparation of the final report.

The final report for the SW Welsh facility is enclosed. This report includes a specific rating for each CCR management unit and recommendations and actions that our engineering contractors believe should be undertaken to ensure the stability of the CCR impoundment(s) located at the SW Welsh facility. These recommendations are listed in Enclosure 2.

Since these recommendations relate to actions which could affect the structural stability of the CCR management units and, therefore, protection of human health and the environment, EPA believes their implementation should receive the highest priority. Therefore, we request that you inform us on how you intend to address each of the recommendations found in the final report. Your response should include specific plans and schedules for implementing each of the recommendations. If you will not implement a recommendation, please explain why. Please provide a response to this request by May 19, 2011. Please send your response to:

Mr. Stephen Hoffman  
US Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

If you are using overnight or hand delivery mail, please use the following address:

Mr. Stephen Hoffman  
US Environmental Protection Agency  
Two Potomac Yard  
2733 S. Crystal Drive  
5<sup>th</sup> Floor, N-237  
Arlington, VA 22202-2733

You may also provide a response by e-mail to [hoffman.stephen@epa.gov](mailto:hoffman.stephen@epa.gov)

This request has been approved by the Office of Management and Budget under EPA ICR Number 2350.01.

You may assert a business confidentiality claim covering all or part of the information requested, in the manner described by 40 C. F. R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when EPA receives it, the information may be made available to the public by EPA without further notice to you. If you wish EPA to treat any of your response as “confidential” you must so advise EPA when you submit your response.

EPA will be closely monitoring your progress in implementing the recommendations from these reports and could decide to take additional action if the circumstances warrant.

You should be aware that EPA will be posting the report for this facility on the Agency website shortly.

Given that the site visit related solely to structural stability of the management units, this report and its conclusions in no way relate to compliance with RCRA, CWA, or any other environmental law and are not intended to convey any position related to statutory or regulatory compliance.

If you have any questions concerning this matter, please contact Mr. Hoffman in the Office of Resource Conservation and Recovery at (703) 308-8413. Thank you for your continued ongoing efforts to ensure protection of human health and the environment.

Sincerely,  
/Suzanne Rudzinski/, Director  
Office of Resource Conservation and Recovery

Enclosures

### **1.2.1 Recommendations Regarding the Structural Stability**

It is recommended that AEP monitor the slopes and embankments of the Primary Ash and Secondary Ash Management Units. This is based on the embankment failure of a section of the Secondary Ash Pond and the findings presented in the 22 June 2010 geotechnical report. The scope of the recommended monitoring system is outlined in Section 1.2.7.

It is recommended that AEP perform a slope stability analysis of the Active Bottom Ash Storage Pond.

### **1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety**

Primary Ash, Secondary Ash, and Active Bottom Ash Storage Ponds – With the generation of the Freese and Nichols report, no recommendations are warranted at this time.

### **1.2.3 Recommendations Regarding the Supporting Technical Documentation**

Structural stability documentation for the Active Bottom Ash Storage Pond was not provided; this documentation is needed.

### **1.2.4 Recommendations Regarding the Description of the Management Unit(s)**

Primary Ash, Secondary Ash, and Active Bottom Ash Storage Ponds- None appear warranted at this time.

### **1.2.5 Recommendations Regarding the Field Observations**

Primary Ash Pond and Secondary Ash Pond Dam – None appear warranted at this time.

### **1.2.6 Recommendations Regarding the Maintenance and Methods of Operation**

Primary Ash, Secondary Ash, and Active Bottom Ash Storage Ponds– Information presented in the June 2010 geotechnical engineering reports indicates that the Primary Ash Pond and Secondary Ash Pond embankments have localized areas subject to slope failures related to water entering the embankment. Dewberry recommends that any cracks observed during routine inspections be repaired and sealed to prevent rainwater from entering the embankments.

### **1.2.7 Recommendations Regarding the Surveillance and Monitoring Program**

Primary Ash and Secondary Ash – Due to the slope failure on a portion of the down gradient side of the Secondary Ash Pond, Dewberry recommends installing

a slope monitoring system. As the Primary Ash Pond was constructed together with the Secondary Ash Pond, the recommendation for a slope monitoring system applies to both ponds.

The recommended slope monitoring system should provide for measurement of vertical and lateral movements of critical areas of the embankments. A network of benchmarks for elevation measurements combined with slope inclinometers installed at the crest, mid slope and near the embankment toe will provide important data needed to monitor slope stability.

Active Bottom Ash Storage Ponds– No additional recommendations for the surveillance and monitoring program appear warranted at this time.

#### **1.2.8 Recommendations Regarding Continued Safe and Reliable Operation**

Primary Ash, Secondary Ash, and Active Bottom Ash Storage Ponds – No additional recommendations for continued safe and reliable operation appear warranted at this time.